

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	Case No. 2:21-CR-00290
	:	
	:	
v.	:	
	:	
MOSES SLANGER WRIGHT,	:	
	:	
Defendant.	:	

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant, Moses Slanger Wright, by and through counsel, Michael T. van der Veen, and requests that this Honorable Court amend his Conditions of Release, and in support of said motion states as follows:

- 1) On July 29, 2021, Defendant was indicted in the United States District Court for the Eastern District of Pennsylvania.
- 2) On June 23, 2022, Defendant was arrested in Pennsylvania.
- 3) On June 24, 2022, Defendant appeared before U.S. Magistrate Judge Richard A. Lloret and was arraigned.
- 4) On December 14, 2022, Defendant's conditions of release were modified to allow him to travel freely throughout the entirety of the Eastern District of Pennsylvania.
- 5) Defendant's trial is currently set to begin on May 1, 2024.
- 6) Defendant is fully compliant with the current imposed conditions of release.
- 7) Defendant respectfully requests Your Honor remove the location monitoring condition of his release. More specifically, Defendant respectfully requests his ankle monitor be

- removed, as there has been a significant change in circumstances since Defendant's previous motion to modify conditions of release.
- 8) On April 18, 2023, during a Status Conference with the Honorable Eduardo C. Robreno, the Government informed His Honor and Defense counsel that the Government is still collecting discovery, which would eventually require security clearance. To date, defense counsel has not received any of this additional discovery.
 - 9) Furthermore, as it pertains to discovery, Defense counsel has been made aware that in similar cases like the one at bar, international government agencies have discovered witnesses being paid for providing false testimony. However, Defense counsel, despite numerous requests, has not yet been provided with all information pertaining to this revelation.
 - 10) Throughout the aforementioned *Brady* discovery issues, Defendant continues to be subject to location monitoring as a condition of his release.
 - 11) Defendant is currently 71 years old, turning 72 years old on May 15, 2024. Defendant has physical issues/hinderances that arise from having to wear an ankle monitor twenty-four hours a day, causing his health to regress.
 - 12) As such, Defendant respectfully requests Your Honor to modify his conditions of release as outlined above.
 - 13) All other pretrial supervision conditions will remain in effect.

14) Therefore, Defendant requests this Honorable Court to remove the location monitoring condition of his release, and more specifically, Defendant respectfully requests his ankle monitor be removed.

WHEREFORE, based on the foregoing, the Defendant requests to be removed from the location monitoring condition of his release, and allow the ankle monitor be removed.

Respectfully Submitted,

Date: February 14, 2024

/s/ Michael T. van der Veen
Michael T. van der Veen
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Date: February 14, 2024

/s/ William J. Brennan
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of February, 2024, a copy of the foregoing *Motion to Modify Conditions of Release* was electronically filed with the Clerk of the United States District Court using CM/ECF, with a notice of said filing to the following:

Counsel for the Government:

Linwood C. Wright, Jr., AUSA
Assistant United States Attorney
Eastern District of Pennsylvania
l.c.wright@usdoj.gov

/s/ Michael T. van der Veen
Michael T. van der Veen, Esq.

/s/ William J. Brennan
William J. Brennan, Esq.

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ORDER

Upon consideration of the Defendant's *Motion to Modify Conditions of Release*, it is hereby ordered by the United States District Court for the Eastern District of Pennsylvania that the Motion be granted and that the Defendant's conditions of release requiring location monitoring and requiring Defendant to wear an ankle monitor be removed.

Date:

JUDGE GENE E. K. PRATTER